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March 2, 2007

VIA FACSIMILE

The Honorable Frank Maas
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 740
New York, NY 10007

Approved
Fuller, USMJ
3/2/07

Re: In re: Terrorist Attacks of September 11, 2001. 03 MDL 1570 (RCC) (FA)

Dear Judge Maas:

On behalf of defendant Saudi Binladin Group ("SBG"), I write to request that the Court defer the discovery conference in this matter currently set for Thursday, March 8, 2007 at 5:00 p.m. Mr. Haeefe has authorized me to state that Plaintiffs do not object to this request, although they reserve their rights as to any further extensions.

Counsel for SBG has been working to collect and verify information for its supplemental discovery responses as required by the Court's recent order. Doing so in Saudi Arabia, however, has presented unique logistical difficulties. We expect to be in a position to provide the *Burnett* Plaintiffs with supplemental responses to their discovery requests by March 16, and propose that the parties meet and confer on those responses and propose a new date for a discovery conference as soon thereafter as practicable.

Respectfully submitted,

James E. Gauch
James E. Gauch

cc: Robert T. Haeefe, Esq. (via facsimile)
Andrea Bierstein, Esq. (via facsimile)